

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

LEON WEINGRAD,	:	Civil Action
	:	
Plaintiff	:	No. 2:23-cv-05114-MAK
	:	
v.	:	
	:	
TOP HEALTHCARE OPTIONS INSURANCE	:	
AGENCY INC. f/k/a "NATIONAL HEALTH	:	
ENROLLMENT CENTRE"	:	
	:	

MOTION FOR ADMISSION PRO HAC VICE OF ATTORNEY JEFFREY B. PERTNOY

Defendant Top Healthcare Options Insurance Agency Inc. ("THO"), through counsel, and with the agreement of counsel for Plaintiff, now moves for admission pro hac vice of Jeffrey B. Pertnoy, Esquire. In support thereof, THO avers as follows:

1. Plaintiff initiated this action on December 26, 2023. (Doc. 1).
2. On June 28, 2024, Plaintiff filed an Amended Complaint naming THO. (Doc. 12).
3. THO's deadline to respond to the Amended Complaint is August 26, 2024. (Doc. 19).
4. The undersigned is admitted to practice and in good standing before this Court.
5. The undersigned's appearance has been entered in this case as of July 29, 2024 by the filing of THO's Motion for an Extension of Time. (Doc. 18).
6. The undersigned confirms his obligations under Section I(K) of this Court's Policies and Procedures, to sign all filings and be available by telephone and prepared to substantively address fact and legal issues for this action.
7. THO requires the admission pro hac vice of Jeffrey B. Pertnoy, Esquire as THO has chosen Mr. Pertnoy to act as lead counsel in this matter. Mr. Pertnoy is familiar with THO's

practices, policies, and procedures and trusts Mr. Pertnoy's guidance with respect to the defense of putative TCPA class actions.

8. Mr. Pertnoy's robust experience defending TCPA class actions, and his intimate and extensive knowledge of and familiarity with THO's practices, policies, and procedures is critical to THO's defense of this case and will allow THO to efficiently defend this matter. Mr. Pertnoy's direct involvement in this case via admission pro hac vice will also potentially help facilitate an early resolution of this matter.

9. THO has conferred with Plaintiff as to this Motion and Plaintiff consents to this Motion.

10. A true and correct copy of Mr. Pertnoy's Affidavit pursuant to Section I(J) of this Court's Policies and Procedures is attached as **Exhibit 1**.

11. A true, correct, and completed copy of Mr. Pertnoy's Application Form Pursuant to L. Civ. R. 83.5.2(b) is attached as **Exhibit 2**.

12. A true and correct copy of this Motion's Proposed Order, with Sponsor's Statement and Certificate of Service is attached as **Exhibit 3**.

13. THO, therefore, respectfully requests that this Motion be granted and that Attorney Jeffrey B. Pertnoy be admitted pro hac vice pursuant to L. Civ. R. 83.5.2(b) and this Court's Policies and Procedures.

KAUFMAN DOLOWICH LLP

Dated: August 5, 2024

/s/ Richard J. Perr

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*Attorneys for Defendant Top Healthcare Options
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CERTIFICATE OF SERVICE

I, Richard J. Perr, certify that I caused a true and correct copy of the foregoing Motion, and all attendant documents, to be served on all counsel of record in this action via the Court's CM/ECF system on the date indicated below.

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Dated: August 5, 2024

/s/ Richard J. Perr

Richard J. Perr